Exhibit 2



Transcript of Jean-Pierre Biard

Date: January 25, 2023

Case: Legalforce RAPC Worldwide -v- Legalforce, Inc.

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1
                  UNITED STATES DISTRICT COURT
                 NORTHERN DISTRICT OF CALIFORNIA
2
3
                     SAN FRANCISCO DIVISION
4
5
    LEGALFORCE RAPC WORLDWIDE, P.C., :
6
             Plaintiff,
7
       V.
                                        : Case No.
8
    LEGALFORCE, INC., a Japanese : 3:22-cv-03724-TLT
9
    corporation,
10
             Defendant.
11
12
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14
                         CONFIDENTIAL
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16
                         Deposition of
17
                       JEAN-PIERRE BIARD
                          Tokyo, Japan
18
19
                   Wednesday, January 25, 2023
             10:26 a.m. Japan Standard Time (UTC+9)
20
21
22
     Job No.: 478532
23
24
     Pages: 1 - 156
25
     Reported By: M. Allred, RPR
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Transcript of Jean-Pierre Biard

January 25, 2023

1	Deposition of JEAN-PIERRE BIARD, conducted
2	at the offices of:
3	
4	U.S. EMBASSY IN JAPAN - TOKYO
5	1-10-5 Akasaka
6	Minato-ku, Tokyo 107-8420
7	Phone: +81-03-3224-5000
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10	Pursuant to notice, before M. Allred,
11	Registered Professional Reporter.
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Transcript of Jean-Pierre Biard

January 25, 2023

1	APPEARANCES
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3	ON BEHALF OF PLAINTIFF:
4	RAJ ABHYANKER, ESQUIRE
5	LEGALFORCE RAPC WORLDWIDE P.C.
6	1580 W. El Camino Real, Suite 10
7	Mountain View, CA 94040
8	Phone: +1-650-390-6461
9	
10	
11	ON BEHALF OF DEFENDANT:
12	NAOKI YOSHIDA, ESQUIRE
13	FINNEGAN, HENDERSON, FARABOW, GARRETT &
14	DUNNER, LLP
15	33rd Floor, Shiroyama Trust Tower
16	3-1, Toranomon 4-chome
17	Minato-ku, Tokyo, Japan 105-6033
18	Phone: +81-3-3431-6943
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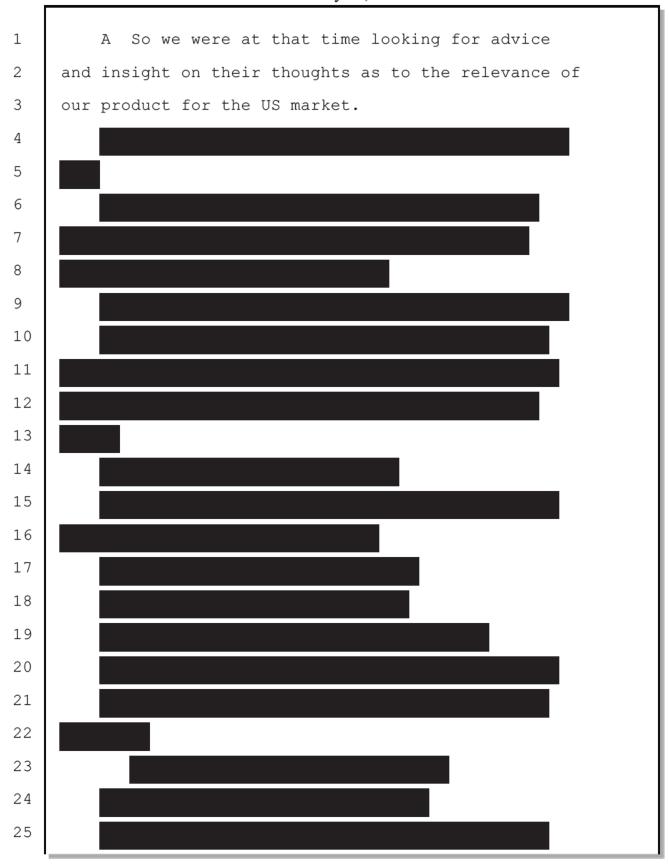
Transcript of Jean-Pierre Biard

January 25, 2023

1	MR. ABHYANKER: So you blanket designated
2	the entire transcript and contents?
3	MR. YOSHIDA: Yes, for now. For now.
4	MR. ABHYANKER: All right. Yeah. We object
5	to that, but we'll agree to that for now.
6	MR. YOSHIDA: Okay. And second is that
7	Mr. Biard is here to testify in his personal
8	capacity, and the subject matter is limited to
9	jurisdiction. So I'm not going to reserve objection
10	as to relevance.
11	I'm going to instruct him not to respond to
12	anything unrelated to the jurisdiction issues.
13	MR. ABHYANKER: Well, you can't instruct him
14	not to respond. You can you can certainly raise
15	the objection. He can respond. And then we will
16	preserve the argument for the judge later on.
17	MR. YOSHIDA: That's fine. That's fine.
18	And last one is that also I'm not going to
19	reserve the objection with respect to highly
20	confidential matters. I understand that the motion
21	is pending currently. So that we'll not going to be
22	reserving objections as to the highly confidential
23	information, including business confidential
24	information, highly confidential highly sensitive
25	business information, and trade secret information

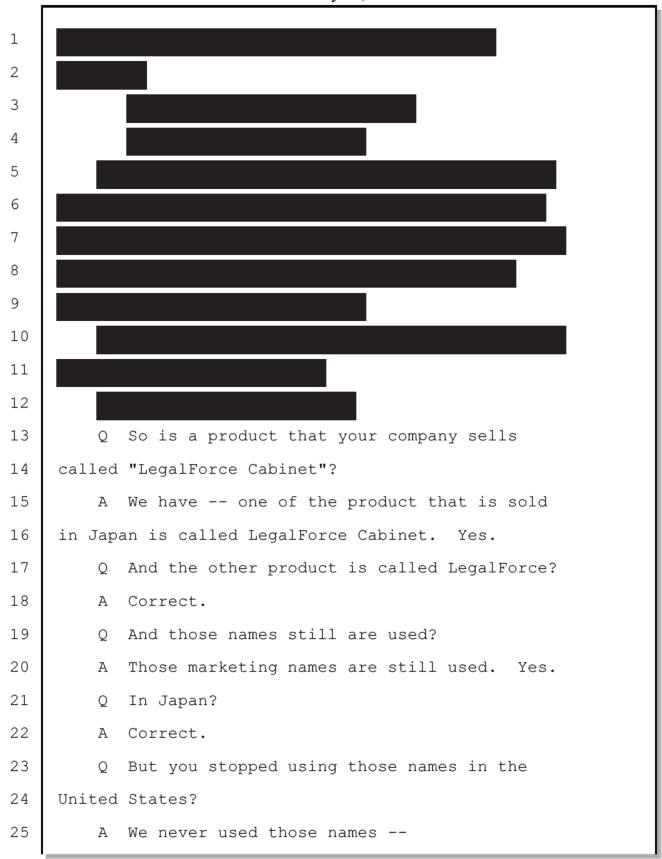
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Transcript of Jean-Pierre Biard

January 25, 2023



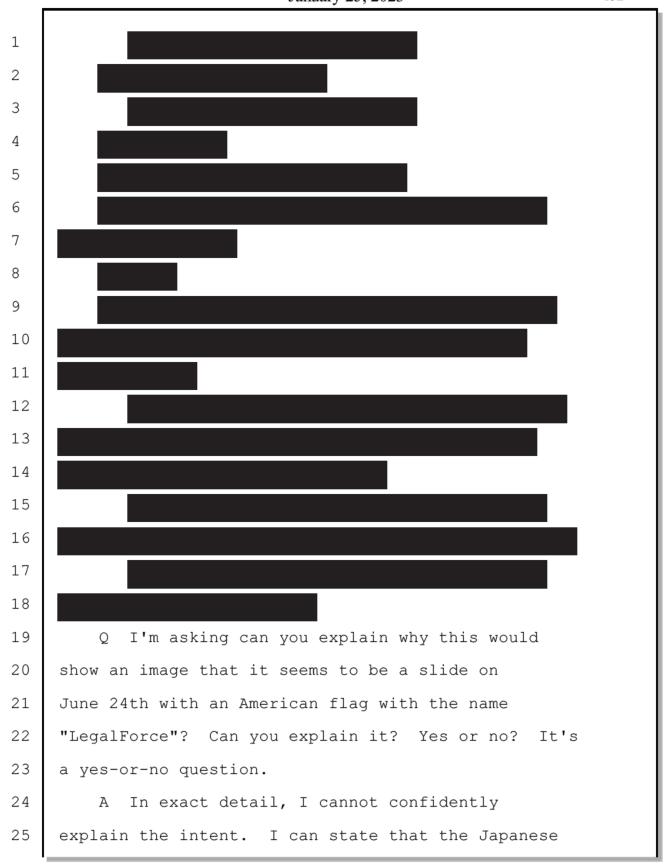
Transcript of Jean-Pierre Biard January 25, 2023

5, 2023

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3	Q Did LegalForce ever advertise as expanding
4	to the United States using the "LegalForce" name?
5	A It LegalForce, the Japanese entity, never
6	advertised an expansion under the LegalForce name.
7	Q Into the United States?
8	A Into the United States. So okay.
9	Q Did LegalForce ever advertise employment
10	opportunities for engineers saying that they're
11	going to expand to the United States using the
12	"LegalForce" name?
13	A So there was advertising, so a job search, a
14	job posting done so the answer is no. Not using
15	that name for the United States.
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Transcript of Jean-Pierre Biard

January 25, 2023



Transcript of Jean-Pierre Biard January 25, 2023

25, 2023

